

EXHIBIT A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re: Chapter 11

FTX TRADING LTD., *et al.*,¹ Case No. 22-11068 (JTD)

Debtors. (Jointly Administered)

Ref. No. __

**ORDER SUSTAINING FTX RECOVERY TRUST'S ONE HUNDRED FIFTIETH
(NON-SUBSTANTIVE) OMNIBUS OBJECTION TO CERTAIN
SUPERSEDED CLAIMS (CUSTOMER CLAIMS)**

Upon the one hundred fiftieth omnibus objection (the “Objection”)² of the FTX Recovery Trust³, for entry of an order (this “Order”) sustaining the Objection and disallowing and expunging in their entirety the Superseded Claims set forth in Schedule 1 attached hereto; and this Court having jurisdiction to consider the Objection pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and this Court being able to issue a final order consistent with Article III of the United States Constitution; and venue of these Chapter 11 Cases and the Objection in this district being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this matter being a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court having found that proper and adequate notice of the Objection and the relief requested therein has been provided in

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

² Capitalized terms not otherwise defined herein are to be given the meanings ascribed to them in the Objection.

³ The FTX Recovery Trust (a/k/a the Consolidated Wind Down Trust) was established on January 3, 2025, the effective date of the Debtors’ (as defined below) confirmed *Second Amended Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and its Debtor Affiliates* [D.I. 26404-1].

accordance with the Bankruptcy Rules and the Local Rules, and that, except as otherwise ordered herein, no other or further notice is necessary; and responses (if any) to the Objection having been withdrawn, resolved or overruled on the merits; and a hearing having been held to consider the relief requested in the Objection and upon the record of the hearing and all of the proceedings had before this Court; and this Court having found and determined that the relief set forth in this Order is in the best interests of the FTX Recovery Trust; and that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Objection is SUSTAINED as set forth herein.
2. Each Superseded Claim set forth in Schedule 1 attached hereto is disallowed and expunged in its entirety. The claims listed in the column titled “Surviving Claims” identified on Schedule 1 attached hereto shall remain on the claims register, subject to (a) the FTX Recovery Trust’s further objections on any substantive or non-substantive grounds and (b) any order with respect to any prior or subsequent objection to the “Surviving Claims” identified on Schedule 1 attached hereto.
3. Should one or more of the grounds of objection stated in the Objection be dismissed, the FTX Recovery Trust’s right to object on any other grounds that the FTX Recovery Trust discovers is preserved.
4. This Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object to or defend on any basis are expressly

reserved with respect to any Superseded Claims referenced or identified in the Objection that is not listed on Schedule 1 attached hereto.

5. To the extent a response is filed regarding any Superseded Claim, each such Superseded Claim, and the Objection as it pertains to such Superseded Claim, will constitute a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order will be deemed a separate order with respect to each Superseded Claim. Any stay of this Order pending appeal by any claimants whose claims are subject to this Order shall only apply to the contested matter which involves such claimant and shall not act to stay the applicability and/or finality of this Order with respect to the other contested matters listed in the Objection or this Order.

6. The FTX Recovery Trust is authorized and empowered to execute and deliver such documents, and to take and perform all actions necessary to implement and effectuate the relief granted in this Order.

7. Nothing in this Order or the Objection is intended or shall be construed as a waiver of any of the rights the FTX Recovery Trust may have to enforce rights of setoff against the claimants.

8. Nothing in the Objection or this Order, nor any actions or payments made by the FTX Recovery Trust pursuant to this Order, shall be construed as: (a) an admission as to the amount of, basis for, or validity of any claim against the Debtors or the FTX Recovery Trust under the Bankruptcy Code or other applicable non-bankruptcy law; (b) a waiver of the FTX Recovery Trust's or any other party-in-interest's right to dispute any claim; (c) a promise or requirement to pay any particular claim; (d) an implication or admission that any particular claim

is of a type specified or defined in this Order; (e) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the FTX Recovery Trust; or (f) a waiver of any claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law.

9. This Order is immediately effective and enforceable, notwithstanding the possible applicability of Bankruptcy Rule 6004(h) or otherwise.

10. This Court shall retain jurisdiction with respect to any matters, claims, rights or disputes arising from or related to the Objection or the implementation of this Order.

Dated: _____
Wilmington, Delaware

The Honorable John T. Dorsey
Chief United States Bankruptcy Judge

SCHEDULE 1

Superseded Claims

FTX Trading Ltd. 22-11068 (JTD)
One Hundred Fiftieth Omnibus Claims Objection
Schedule 1 - Superseded Claims

Claim Number	Claims to be Disallowed				Surviving Claims				
	Name	Debtor	Tickers	Claim Quantity	Claim Number	Name	Debtor	Tickers	Ticker Quantity
98902	Name on file	FTX Trading Ltd.			98379*	Name on file	FTX Trading Ltd.	SOL	
		AVAX		0.0000010479446480			AVAX		0.0000010479446480
		BNB		0.00000000884970			BNB		0.00000000884970
		BTC		0.0000000000000000			BTC		0.0000000000000000
		ETH		0.0000000000000000			ETH		0.0000000000000000
		FTM		46.155.51970628967000			FTM		46.155.51970628967000
		IMX		0.0032568600000000			GRT		0.0032568600000000
		LUNA2		0.0228819300000000			IMX		0.0032568600000000
		LUNC		0.0000000000000000			LUNA2		0.0000000000000000
		RAY		0.00000000516180			LUNC		0.00000000516180
		RSR		0.00244639829132			RAY		0.00798468304100
		RUNE		0.0000000000000000			RSR		0.0000000000000000
		SOL		0.000000000544778			RUNE		0.000000000544778
		SUSHI		0.0000000000000000			SOL		0.0000000000000000
		TRX		4.631.56390104197000			SUSHI		0.0000000000000000
		USD		116.373.7471319000			TRX		0.0000000000000000
		USDC		0.917.709125884190			USD		0.0000000000000000
		USDT		0.005158729584394			USDC		0.0000000000000000
		XRP		0.000000008879660			USDT		0.000000008879660
									POC-Other Crypto Assertions: SYNTHETIC
									88.17000000000000
									1.7400000000000000
									4.631.56390104197000
									116.373.7471319000
									0.917.709125884190
									0.005158729584394
									0.000000008879660
97534	Name on file	West Realm Shires Services Inc.		Undetermined*	97548	Name on file	West Realm Shires Services Inc.	USD	25.000.000000000000
67734	Name on file	FTX Trading Ltd.	ATOM	119.587215100000	98540	Name on file	FTX Trading Ltd.	ATOM	0.0000000000000000
		BNB		3.9526289000000000			BNB		3.9526289000000000
66846	Name on file	Quoine Pte Ltd	SGD	250.0000000000000000	98718	Name on file	Quoine Pte Ltd	BTC	0.0023350900000000
								JPY	2.6600000000000000
								SGD	14.2100000000000000
77946	Name on file	West Realm Shires Services Inc.	DOGE	908.0800000000000000	98369*	Name on file	FTX Trading Ltd.	Undetermined*	
		GRT		1.0090000000000000					
		USD		356.0060000000000000					
97598	Name on file	FTX Trading Ltd.	BULL	Undetermined*	97622	Name on file	West Realm Shires Services Inc.	BTC	0.1108900434712341
39589	Name on file	FTX Trading Ltd.	BULL	Undetermined*	98799	Name on file	FTX Trading Ltd.	BTC	0.22903161139845
98738	Name on file	FTX Trading Ltd.	BULL	100.0000000000000000	98799	Name on file	FTX Trading Ltd.	ETH	1.0000000000000000
98759	Name on file	FTX Trading Ltd.	ETHBULL	3.0000000000000000	98799	Name on file	FTX Trading Ltd.	ETH	0.0000000000000000
		BTC		Undetermined*	98799	Name on file	FTX Trading Ltd.	ETH	6.0000000000000000
		ETH							6.0000000000000000
1682	Name on file	FTX Trading Ltd.	USD	25.000.0000000000000000	98172	Name on file	FTX Trading Ltd.	Undetermined*	
81471	Name on file	FTX Trading Ltd.	ATOM	0.128610555307187	97643	Name on file	FTX Trading Ltd.	ATOM	0.128610555307187
		BTC		0.0000000000000000			BTC		0.0000000000000000
		CRV		15.9971200000000000			CRV		15.9971200000000000
		ETH		0.2889515800000000			ETH		0.2889515800000000
		EUR		882.97925383691100			EUR		882.97925383691100
		LUNA2		0.0000000000000000			LUNA2		0.0000000000000000
		LUNA2_LOCKED		0.0000000000000000			LUNA2_LOCKED		0.0000000000000000
		LUNC		0.0089446000000000			LUNC		0.0089446000000000
		LUNC-PERP		0.0000000000000000			TRX		0.0000000000000000
		TRX		0.0000000000000000			USD		0.0000000000000000
		USD		0.0000000000000000			USDT		0.0000000000000000
		USDT		0.00000001533156			USDC		0.4249620000000000
		USTC		0.4849620000000000					
75786	Name on file	FTX Trading Ltd.	USD	0.0000000000000000	98558	Name on file	FTX Trading Ltd.	XRP	746.9150000000000000
		USDT		0.0000000000000000					
		XRP		746.9154782700000000					